

Gary Grimm

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August 28, 2020

MacElvree Harvey Ltd.
17 West Miner St.
West Chester, PA. 19382
Attention, Leo Gibbons

RE: #17- 10625, Motion For Stay Violation
Subject: discovery admissions

Pursuant to Fed. R. Bankr. P. 7036, you are hereby requested to admit for the purposes of this action only:

#	ADMISSION
1	John Campion and JCPR, hereafter Campion, took possession of 839 Swede St. in April 2017 at which time locks were changed. Answer:
2	Campion was aware that Grimm Brothers Realty Company, hereafter Grimm Brothers, and Gary Grimm, hereafter Grimm, had personal property stored in the basement of 839, hereafter 839. Answer:
3	Grimm informed Campion several times that Grimm Brothers and Grimm were in bankruptcy. Answer:
4	Campion, or his counsel, was informed by Grimm Brothers Bankruptcy attorney Joshua Thomas Esq. that Grimm Brothers was in Bankruptcy. Answer:
5	Campion supplied Grimm with a key to the basement of 839. Answer:
6	Sometime during November 2017 Campion installed an additional lock on the basement of 839 and did not give Grimm a key. Answer:

7	Campion received an email from Grimm on December 5, 2017 requesting that he unlock the second lock. Answer:
8	Campion, did not unlock the second lock, provide Grimm a key, or respond to Grimm's email. Answer:
	Grimm met Campion at the property in January 2018 and spoke to him about leaving the second lock to the basement unlocked so he could access property. Answer:
9	Grimm e-mailed Campion on January 20, 2018 again asking him to provide him with a key. Answer:
10	Campion, did not unlock the second lock, provide Grimm a key, or respond to Grimm's email. Answer:
11	On February 28, 2018, Campion called police claiming a breaking and entering committed by Gary Grimm into the basement of 839. Answer:
12	On February 28, 2018, Campion told Grimm in front of Norristown police officer Buckwalter that he had two weeks to get his property out of 839. Answer:
13	Campion did not petition the bankruptcy court for relief from the stays prior to calling police. Answer:
14	Campion did not post the basement of 839 informing Grimm the property must be removed prior to calling police and filing complaint. Answer:
15	On March 6, 2018 attorney for Campion sent Grimm, a 10 day notice to make arrangements to remove property with a 30 day storage provision. Answer:

16	On April 4, 2018, counsel for Grimm Brothers was sent an email from Campion's attorney, Keely Carr Brady, stating that they were unaware of the bankruptcy. Answer:
17	Campion, did not withdraw complaint after attorney knowledge the existence of bankruptcy stating they would take no further action without applying to the court for relief from the stay, resulting in Grimm's imprisonment Answer:
18	Campion is aware that under the Pennsylvania criminal code, that criminal trespass is committed when a person not privileged to do so, enters a secured property through subterfuge. Answer:
19	Grimm had privilege to access their property located in 839. Answer:
20	While Grimm was in prison, Campion as a condition to withdraw his complaint that Grimm sign an agreement to remove all property from 839. Answer:
21	Campion demanded that Grimm sign an agreement releasing him of all liability before he would withdraw the complaint. Answer:
22	After Grimm's release from prison Campion left the basement of 839 without a lock for approximately 6 months. Answer:
23	Campion, did not motion the court for relief from stays until August 19, 2019 Answer:

Sincerely

Gary Grimm